

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

STEPHEN E. PODEWELL,

Plaintiff,

v

APPLEBEE'S RESTAURANTS MID-ATLANTIC
LLC,

Defendant.

Case No. 1:15-cv-00432

Hon. Gordon J. Quist

**Defendant's Second Set of Requests to
Admit and Related Interrogatories and
Request to Produce Directed to Plaintiff**

Defendant Applebee's Restaurants Mid-Atlantic LLC directs the following Requests to Admit and Related Interrogatories and Requests to Produce to Plaintiff Stephen E. Podewell to be answered within thirty days, pursuant to Federal Rule of Civil Procedure 36.

"The Incident" refers to the incident at Applebee's Restaurant on January 24, 2012, which forms the basis of your Complaint in this matter.

REQUEST TO ADMIT NO. 1:

Admit that you have not suffered any physical injury as a result of the Incident, including any dental injury.

RESPONSE:

INTERROGATORY NO. 1:

If your response to the preceding Request is anything other than an unqualified admission, please attach a copy of all documents in your possession or that you can obtain from any of your agents or medical or dental providers that support your Answer.

RESPONSE:

REQUEST TO ADMIT NO. 2:

Admit that you have not sustained any emotional or mental injury as a result of the Incident.

RESPONSE:

INTERROGATORY NO. 2:

If your response to the preceding Request is anything other than an unqualified admission, please attach a copy of all documents in your possession or that you can obtain from any of your agents or medical or mental health providers which support your Answer.

RESPONSE:

REQUEST TO ADMIT NO. 3:

Admit that you have not sustained any economic damage as a result of the Incident.

RESPONSE:

INTERROGATORY NO. 3:

If your response to the preceding Request is anything other than an unqualified admission, please attach a copy of all documents in your possession or that you can obtain from any of your agents, accountants, tax preparers, present or former employers, or medical or dental providers, which support your Answer.

RESPONSE:

Dated: November 30, 2015

PLUNKETT COONEY

/s/ Sandra J. Densham
Sandra J. Densham (P69397)
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Certificate of Service

I, Sandra J. Densham, certify that on November 30, 2015, a copy of Defendant's Second Request to Admit with Related Interrogatories and Request to Produce was served by email and First Class Mail on the following:

Stephen E. Podewell
6814 West "B" Avenue
Plainwell, MI 49080-9702
podewell@yahoo.com

Dated: November 30, 2015

/s/ Sandra J. Densham
Sandra J. Densham
Plunkett Cooney
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